

**REMARKS/ARGUMENTS**

Reexamination of the captioned application is respectfully requested.

**A. SUMMARY OF THIS AMENDMENT**

By the current amendment, Applicant basically:

1. Cancels claims 2, 6, 7, 8 and 10 without prejudice or disclaimer.
2. Amends claims 1, 3, 14, and 15.
3. Adds new claims 20-23.
4. Respectfully traverses all prior art rejections.
5. Advises the Examiner of the simultaneous filing of a Request for Continuing Examination and Petition to Extend.

**B. PATENTABILITY OF THE CLAIMS**

Claims 1-15 and 18-19 stand rejected under 35 USC 102(e) as being anticipated by U.S. Patent 7,127,250 to Gallagher et al. All prior art rejections are respectfully traversed for at least the following reasons.

Applicant's access controller communicates directly with mobile stations located in mini-cells of an unlicensed access network. The mobile stations thus establish a static connection (e.g., TCP connection) with the access controller directly over the broadband network. Prior to the establishment of this connection there is no communication between an access point and the access controller. The access point merely serves as an interface between the unlicensed radio link and the broadband network. Accordingly, the access controller holds no information on the access points. In an example embodiment, the mobile stations are themselves assigned a network address on the broadband network. It is this network address that is stored in the access controller and used for paging messages, for example. Since each mobile station is provided with a unique network

address on the broadband network, even when they are connected via the same access point, the access controller can address paging messages only to the mobile station concerned (see in this regard page 16, lines 23-26).

Amended independent claims 1 and 14 as well as new independent claim 20 specify that the access controller *communicates directly with mobile stations located in mini-cells of the unlicensed-radio access network*. Moreover, the access controller *comprises a database for storing an identification of a mobile station in association with a network address for said mobile station on said broadband network, wherein said network address is unique to said mobile station so as to enable said access controller to page said mobile station individually*. Method independent claim 14 likewise includes the step of *registering said mobile station identification information in association with said mobile station network address on said fixed broadband network, wherein said network address is unique to said mobile station so as to enable said access controller to page said mobile station individually*.

The claim amendments are supported, e.g., by page 15, line 21 to page 17, line 17 and Fig. 4 and also at page 4, lines 7 to 15 of the application as published.

The claimed subject matter clearly distinguishes over Gallagher. More specifically, Gallagher does not teach the direct registration of a mobile station with an access controller, whereby the network address of the mobile station is stored by the access controller to enable the individual paging of the mobile station. In particular, and as described at Gallagher col. 13, lines 17-37, the data transmitted to the mobile station by the indoor access controller upon IAN registration includes Location Area and Routing Area identities (which may be specific to the indoor access network or be shared between the GSM and indoor access network – see col. 12, lines 26-64) and Cell Identification, which identifies an indoor base station. There is no disclosure of more

detailed address information being exchanged with the access controller. Hence there can be no implication of the storage of individual network addresses for mobile stations. There is also no disclosure or suggestion in Gallagher to enable the transmission of a paging message to the individual mobile station concerned only.

In contrast to Gallagher, and as stated at page 16, lines 23-26 of Applicant's specification, two mobile stations may communicate via the same access point but will nevertheless have distinct network addresses, thereby enabling the access controller to page a single mobile station only.

#### **C. MISCELLANEOUS**

In view of the foregoing and other considerations, all claims are deemed in condition for allowance. A formal indication of allowability is earnestly solicited.

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for the filing of the request for continued examination (RCE) under 37 CFR §1.114, the entry of these papers, and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Nylander  
Serial No. 10/591,953

Atty Dkt: 4144-9  
Art Unit: 4173

Respectfully submitted,  
**NIXON & VANDERHYE P.C.**

By: /H. Warren Burnam, Jr./  
H. Warren Burnam, Jr.  
Reg. No. 29,366

HWB:lsh  
901 North Glebe Road, 11th Floor  
Arlington, VA 22203-1808  
Telephone: (703) 816-4000  
Facsimile: (703) 816-4100